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1018 Briar Ridge
Houston, Texas 77057-1126
2005 October 07

ORIGINAL

Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Reference: Notice of Proposed Rule Making **DOCKET FILE COPY ORIGINAL**
FCC 05-143 and/or WT Docket 05-235

Dear Commissioners:

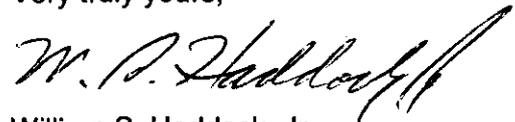
The public interest will not be served by revising the amateur radio service rules to eliminate the 5-wpm telegraphy examination. The Commission apparently has overlooked the wider usage of the international Morse code. Its usage is described in six Web Surveys by the ARRL. The ARRL's Web Surveys are in the public domain. They are informal and reflect only the opinions of those who respond. Each survey had around 3,050-respondents irrespective of their license class.

The surveys' results span 29-months between 2002-06-07 and 2004-11-12 and point to telegraphy being the second-most popular activity in amateur radio. Typically, about 40% of the respondents did not operate or use the international Morse code while about 60% did. Telegraphy certainly did not discourage them from acquiring, using and/or advancing their skills as described next.

The Commission should know that their proficiency is divided around 15-wpm. Survey 136 shows that about 37% operate below or at 15-wpm while about 32% operate at or above 16-wpm. Survey 176 shows that the higher proficiencies are supported by 44% responding that they operate using telegraphy at least 51% of their operating time. Survey 247 shows that about 16% operate using either a straight or semi-automatic (bug) key, which is anticipated below 15-wpm, and that about 18% operate using a keyer/paddles, which is anticipated over 15-wpm. Another 15% operate using more than one of these keys.

The 5-wpm code requirement is simply an entry level proficiency as shown in Survey 136. If telegraphy is not required, a viable resource will be abandoned by the Commission. Amateur radio repeatedly has demonstrated resourcefulness which should not be diminished by the Commission. The public interest will be served better by retaining the 5-wpm telegraphy exam somewhere in the amateur radio service rules.

Very truly yours,



William S. Haddock, Jr.
WA5EJQ

Attachment: ARRL Web Survey Results

No. of Copies rec'd 0
List A B C D E

ARRL WEB SURVEY RESULTS

Poll Number	Date	Question	Do not operate or use CW.	Others		Total
				Qty.	PrCnt.	
136	7-Jun-02	What is your average CW speed?	903	1991	68.8%	2894
176	10-Mar-03	What percentage of operating time is CW?	1002	2071	67.4%	3073
211	7-Nov-03	Did you participate in CW-Sweepstakes?	1884	1417	42.9%	3301
247	9-Jul-04	How do you send CW?	2971	3242	52.2%	6213
263	29-Oct-04	Do you use NCDXF/IARU CW Beacons?	1014	1231	54.8%	2245
265	12-Nov-04	Did you participate in CW-Sweepstakes?	1001	2025	66.9%	3026
		Average			58.8%	
		Typical	1198	1876	61.5%	3074

These surveys suggest that 60% of the respondents operate or use CW.

Reference: www.arrl.org/survey.php3?pollnr=nnn, where nnn is the above "poll number."

DETAILS OF RESULTS OF THREE SURVEYS

136	7-Jun-02	What is your average CW speed during casual conversations?				
		Do not operate CW	903		31.2%	
		Less than 5 WPM		182	6.3%	
		6 - 10 WPM		348	12.0%	
		11 - 15 WPM		540	18.7%	
		16 - 20 WPM		542	18.7%	
		21 - 30 WPM		307	10.6%	
		31 or more WPM		72	2.5%	
		Totals	903	1991	100%	2894
176	10-Mar-03	What percentage of your operating time is spent on CW?				
		Do not operate CW	1002		32.6%	
		Less than 25 %		525	17.1%	
		26 - 50 %		192	6.2%	
		51 - 75 %		265	8.6%	
		76 - 100 %		1089	35.4%	
		Totals	1002	2071	100%	3073
247	9-Jul-04	How do you send CW?				
		Do not operate CW	2971		47.8%	
		Straight Key		729	11.7%	
		Bug (Semi-automatic)		281	4.5%	
		Keyer / Paddles		1111	17.9%	
		Keyboard		208	3.3%	
		More than one of the above		913	14.7%	
		Totals	2971	3242	100%	6213